

**Remarks**

Favorable reconsideration of this application is requested in view of the above amendments and in light of the following remarks and discussion.

Claims 17-74 are pending in the application. Claims 17, 24, 33, 44, 46, 53 and 73 are amended. Support for the changes to the claims is self-evident from the originally filed disclosure, including the original claims, and therefore no new matter is added.

In the Office Action independent claims 17 and 46 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,535,011 to Yamagami et al. (Yamagami) in view of U.S. Patent No. 5,260,735 to Ishikawa et al. (Ishikawa). The dependent claims are rejected as being unpatentable over Yamagami in view of Ishikawa, and in further view of U.S. Patent No. 5,430,496 to Silverbrook, U.S. Patent No. 5,809,068 to Johnson, U.S. Patent No. 5,018,017 to Sasaki et al., or U.S. Patent No. 5,771,354 to Crawford. It is requested that the rejections be withdrawn, and that the claims be allowed, for the following reasons.

The present invention, as recited in independent claim 17, is directed to a digital image capturing system including a digital image capturing device. Specifically, independent claim 17 recites a processor connected to a first input/output interface and to a second input/output interface configured to receive a card that stores a control program. The processor is configured to control the card both through the second input/output interface by executing the control program as well as by a command program received through the first input/output interface.

The claimed invention can provide numerous advantages. For example, the card connected to a digital camera can be controlled by either a control program on the card itself, which is transmitted to the processor through the second input/output interface, or through a command program transmitted to the processor through the first input/output interface. Thus, control of the camera is very flexible, because the card can be controlled through either the

first or second interface. Further, if the first or second interface is damaged such that control information (e.g., the control program or the command program) cannot be transmitted through that interface to the processor, the undamaged interface can still be used to transmit the control information to the processor, and the card and camera can continue to be controlled. Still further, because the control information is so easily transmitted to the processor, such as on a card that can be conveniently carried and connected to the second interface of the camera, the processor is not required to store numerous routines and programs that are used infrequently. Thus the size of the memory storing these programs can be reduced, which results in a reduced cost of the memory and thus the processor and camera, as well as a reduction in size of the memory and thus the processor and camera.<sup>1</sup>

Yamagami is directed to a recording and reproducing apparatus. It is submitted, and the Office Action appears to concede,<sup>2</sup> that Yamagami does not disclose or render obvious the claimed features of a processor configured to control a card through the second input/output interface by executing a control program on the card received through the second input/output interface and by executing a command program received through the first input/output interface, as recited in independent claim 17. Rather, Yamagami at most discloses controlling a card through a single interface, but does not disclose controlling a card through two interfaces. Thus, Yamagami is unable to provide the above-discussed advantages.

Although the Office Action relies on Ishikawa to remedy the deficiencies of Yamagami, it is submitted that the combination of Yamagami and Ishikawa does not disclose or render obvious the claimed features recited in independent claim 17.

Ishikawa is directed to a camera system. Ishikawa states, in column 4, lines 17-29, that the IC card including the program or data is inserted into the holder on the camera body.

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<sup>1</sup> Page 15, lines 6-24, of the specification.  
<sup>2</sup> Page 3, lines 11-14, of the Office Action.

The various IC cards include the exposure-type program, the mode-set alteration card, and the demonstration card.

However, it is submitted that Ishikawa does not remedy the deficiencies of Yamagami, as Ishikawa also does not disclose or render obvious the claimed features of a processor configured to control a card through the second input/output interface by executing a control program on the card received through the second input/output interface and by executing a command program received through the first input/output interface. Specifically, Ishikawa does not depict or describe controlling the IC card by executing a control program on the IC card. Rather, Ishikawa at most describes controlling the camera system by executing the program on the IC card. Further, Ishikawa does not describe controlling the camera through two interfaces.

MPEP § 2143.01 states, in relevant part, that “[o]bviousness can only be established by combining or modifying the teachings of the prior art to produce the claimed invention where there is some teaching, suggestion, or motivation to do so found either explicitly or implicitly in the references themselves.” In this case, it is submitted that neither Yamagami nor Ishikawa, both of which fail to show controlling a card through two interfaces, provides the required teaching, suggestion, or motivation to provide the claimed features of controlling a card through two interfaces, and more specifically to provide the claimed features of processor configured to control a card through the second input/output interface by executing a control program on the card received through the second input/output interface and by executing a command program received through the first input/output interface, as recited in independent claim 17. Rather, it is submitted that the only motivation to combine Yamagami and Ishikawa as proposed in the Office Action is provided by the claims themselves.

For the above reasons the allowance of independent claim 17 is requested.

Application No. 09/970,647  
Reply to Office Action of October 19, 2005

Independent claim 46 is allowable for reasons similar to those discussed above with respect to independent claim 17. It is therefore requested that the rejection of independent claim 46 be withdrawn, and that the independent claim be allowed.

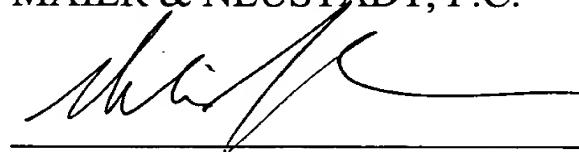
Claims 18-45 and 47-74 are allowable for the same reasons as independent claims 17 and 46 from which they depend, as well as for their own features. The allowance of dependent claims 18-45 and 47-74 is therefore requested.

Consequently, for the reasons discussed in detail above, no further issues are believed to be outstanding in the present application, and the present application is believed to be in condition for formal allowance. Therefore, a Notice of Allowance is earnestly solicited.

Should the Examiner deem that any further action is necessary to place this application in even better form for allowance, the Examiner is encouraged to contact the undersigned representative at the below listed telephone number.

Respectfully submitted,

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